

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

Case No. 17-BK-3283(LTS)

(Jointly Administered)

**APPLICATION FOR ADMISSION *PRO HAC VICE***

Comes now, David R. Keesling (hereafter, the "Applicant") and, pursuant to L. Dist. Ct. R. 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, as incorporated by Rule 1001-l(b) of the Local Bankruptcy Rules as well as this Court's *Fifteenth Amended Notice, Case Management and Administrative Procedures Order (Docket No.17127-1 of Case No. 17-03283 (LTS)) (the "CMP Order")*, hereby requests to be permitted to appear and participate in this particular case, in association with the law firm of McConnell Valdés, LLC, and the undersigned members of the bar of this Court, in representation of party-in-interest by Foreman Electric Services, INC., ("Foreman").

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Applicant herein and respectfully states:

1. Applicant will sign all pleadings with the name “David R. Keesling”, Applicant has been retained as a member of the above-named firm by Foreman Electric Services, INC, (“Foreman”), to appear on its behalf in the above captioned cases now pending before the United States District Court for the District of Puerto Rico, and without waiving any of its affirmative defenses, including insufficient process, insufficient service of process or lack of jurisdiction.

2. Applicant is an attorney and a member of the law firm of (or practices under the name of Dunlap Bennett & Ludwig, with offices at:

Address	6660 South Sheridan Road, Suite 250, Tulsa OK 74133
Email	dkeesling@dbllawyers.com
Telephone No.	(918) 998-9350
Fax No.	(918) 998-9360

3. Since 1998 applicant has been and presently is a member in good standing of the bar of the highest court of the State of Oklahoma, where applicant regularly practices law. Applicant’s bar license number is 17881.

4. Applicant has been admitted to practice before the following federal courts:

Court	Admission Date
Northern District of Oklahoma	07/17/2003
Western District of Oklahoma	03/18/2010
Eastern District of Oklahoma	04/29/2010

Tenth Circuit Court of Appeals	04/24/2012
District of Colorado	09/05/2013
Northern District of Indiana	08/02/2016
Northern District of Texas	10/01/2019
Eastern District of Texas	06/26/2020
Western District of Texas	08/12/2020

5. Applicant is a member in good standing of the bars of the courts listed in paragraph 4 of this Application.

6. Applicant is not currently suspended from the practice of law before any court or jurisdiction.

7. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding, or criminal charges before any court or jurisdiction.

8. Applicant has not been denied admission to, been disciplined by, resigned from, surrendered his license to practice before, or withdrawn an application for admission to practice before any court or jurisdiction, while facing a disciplinary complaint.

9. During the past three (3) years, applicant has not filed for *pro hac vice* admission in the U.S. District Court for the District of Puerto Rico

10. Local counsel of record associated with applicant in this matter is:

Name	Antonio A. Arias-Larcada
USDC-PR Bar	No204906
Address	270 Muñoz Rivera Avenue, Suite 7 Hato Rey, Puerto Rico 00918
Email	<a href="mailto:aaa@mcvpr.com">aaa@mcvpr.com</a>
Telephone No.	787-250-9292
Fax No.	787-759-9225

11. Applicant has read the Local Rules of the United States District Court for the District of Puerto Rico, which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case before the Court. Accordingly, payment of the pro hac vice admission fee is attached hereto in the form of a check or money order payable to: "Clerk, U.S. District Court".

**WHEREFORE**, Applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico.

Date: August 16, 2021.

David R. Keesling  
Printed Name of Applicant

/s/ David R. Keesling  
Signature of Applicant

**I HEREBY CERTIFY THAT**, pursuant to L. Dist. Ct. R. 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, that I consent to the designation of local counsel for all purposes.

Date: August 16, 2021.

Antonio A. Arias-Larcada  
Printed Name of Local Counsel

/s/ Antonio A. Arias-Larcada  
Signature of Local Counsel

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this August 16, 2021

**I HEREBY CERTIFY** that on this same date, we electronically filed the document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all CM/ECF participants.

**MCCONNELL VALDÉS LLC**

*Attorneys for Foreman Electric Services, Inc.*

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By: s/ Antonio A. Arias-Larcada

Antonio A. Arias-Larcada

USDC PR 204906